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Attorney for Debtors  
WARLITO DACQUEL DAGDAGAN and DOMITILLA ORDONEZ DAGDAGAN

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

IN RE:	)	Bankruptcy Case No. 13-21662-D-7
	)	Chapter 7
WARLITO DACQUEL DAGDAGAN	)	DC No. BMV-01
AND	)	
DOMITILLA ORDONEZ DAGDAGAN,	)	
	)	<b>DECLARATION OF DEBTORS'</b>
	)	<b>ATTORNEY, BERT M. VEGA, IN</b>
	)	<b>SUPPORT OF MOTION TO COMPEL</b>
	)	<b>TRUSTEE TO ABANDON DEBTORS</b>
Debtors.	)	<b>BUSINESS</b>

DECLARATION

I, BERT M. VEGA, ESQ., do hereby declare:

1. I am the attorney for Debtors Warlito Dacquel Dagdagan and Domitilla Ordonez Dagdagan in a Chapter 7 Bankruptcy filed on February 7, 2013. Their 341 Meeting is scheduled to be held on March 13, 2013 at 3:00 pm at 501 "I" Street, Room 7B, Sacramento, CA. The matter set forth in this, my declaration, are true of my own knowledge, and if called upon to do so, I could and would competently testify to them.

2. Both Debtors are retired but the Joint Debtor operates a small childcare business which has been declared in their Statement of Financial Affairs.

3. On March 2, 2013, the Trustee brought to my attention that Joint Debtor is prohibited from operating a business in a Chapter 7 bankruptcy without a court order and advised me to inform Joint Debtor to cease operating her childcare business immediately.

4           5. Debtors and Petitioners respectfully request for an Order Compelling the Trustee to  
5   Abandon the Business in favor of the Debtors because it is of inconsequential value and benefit  
6   to the estate under 11 USC § 554 (b) but of great value to the Debtors livelihood.

9 Dated: March 8, 2013

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